

88220

DEPT OF TRANSPORTATION

00 JUL 17 PM 4:01

RS 7/17/00  
NHTSA-00-7013-33

**ISUZU**  
DET-00-110

June 23, 2000

Rosalyn G. Millman  
Acting Administrator  
National Highway Traffic Safety Administration  
400 Seventh Street, SW Room 5220  
Washington, DC 20590

Subject: Docket No. NHTSA-00-7031; Notice 1 49 CFR Parts 552, 571, 585 and 595 - Federal Motor Vehicle Safety Standards; Occupant Crash Protection Final Rule; Interim Final Rule (65 FR 30680; May 12, 2000) Request for Confirmation and Correction

Dear Ms. Millman:

On behalf of Isuzu Motors Limited, Isuzu Motors America, Inc. appreciates the opportunity to request confirmation of the following items set forth in the subject interim final rule.

Although S22.2.2.2(k)(D) of the NPRM and S22.2.2.2(g)(iv) of the SNPRM specified the longitudinal position for the dummy, S22.2.2.8(4) does not contain that information. For purposes of clarity, Isuzu requests that the longitudinal position for the dummy be inserted into S22.2.2.8(4) of the final rule.

S24.2.3(c) states "If the seat is a power seat, move the seat rearward, while assuring that there is a minimum of 5 mm (0.2 in) distance between the vehicle interior and the part of the dummy that was in contact with the vehicle interior" (emphasis added). Isuzu believes that the word "minimum" is incorrect and should read "maximum" as set forth in the preamble: "In instances in which the infant restraint contacts the dashboard in the full-forward position, the vehicle seat will be moved back to the next detent that allows for clearance, or, in the case of automatic seats, until a maximum of 5 mm (0.2 in) of clearance is achieved." (emphasis added).

Appendix A. Section B; Rear facing child restraint systems. The child seat "Century 560 Institutional 4590" is no longer available. Isuzu requests that this child seat be eliminated from the list.

Thank you for your consideration of the above items.

Sincerely,



Akira Nogami  
Chief Representative  
Emissions & Safety  
Isuzu Motors America, Inc.

/cfl

cc: Mr. Suzuki, ISZJ-F R109